

Remarks

Entry of the above-noted amendments, reconsideration of the application, and allowance of all claims pending are respectfully requested. By this amendment, claims 1, 4, 8-9, 17, 20-21, 24, and 34 are amended and claims 2, 5-6, and 19 are canceled. These amendments to the claims constitute a bona fide attempt by applicants to advance prosecution of the application and obtain allowance of certain claims, and are in no way meant to acquiesce to the substance of the rejections. Support for the amendments can be found throughout the specification (e.g., page 10, line 25 to page 11, line 9), figures (e.g., FIGS. 2-3), and claims and thus, no new matter has been added. Claims 1, 3-4, 7-18, and 20-40 are pending.

Allowable Subject Matter:

Claims 2 and 3 were objected to as being dependent upon rejected base claim 1, but were indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants gratefully acknowledge this indication of allowability, and have rewritten independent claim 1 to include all of the limitations of allowable claim 2 and any intervening claims (there were none).

Claim 6 was objected to as being dependent upon rejected base claim 4, but was indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants gratefully acknowledge this indication of allowability, and have rewritten independent claim 1 to include all of the limitations of allowable claim 6 and any intervening claims (claim 5).

Claims 9-10, 17, and 19 were objected to as being dependent upon rejected base claim 8, but were indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants gratefully acknowledge this indication

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of allowability, and have rewritten independent claim 8 to include all of the limitations of allowable claim 19 and any intervening claims (there were none).

Claims 38-40 were objected to as being dependent upon rejected base claim 34, but were indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants gratefully acknowledge this indication of allowability, and are merely deferring the rewriting of claims 38-40 in independent form, pending a determination of patentability of base claim 34.

An indication of allowance of claims 1, 4, and 8 is therefore respectfully requested.

Claim Objections

Claims 9-10, 13, 17, 21 and 24 were objected to because of alleged informalities. Claim 9 has been amended to recite "at least another query" rather than "at least one query". The objections to claims 10 and 13 are moot in view of the amendments to base claim 8 presented herewith. Claim 17 has been amended to recite "at least another query" rather than "at least one query". Claims 21 and 24 have been amended to recite "process the network requests" rather than "process network requests".

Withdrawal of the objection to claims 9-10, 13, 17, 21 and 24 is therefore respectfully requested.

Claim Rejections - 35 U.S.C. §§ 102 and 103

Claims 4-5, 7-8, 11-16, 18, 20-21, 25-27, 29-31, and 33 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Bharatia et al. (U.S. Patent No. 6,615,037; "Bharatia"). Claims 1 and 34-37 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Bharatia. Claims 22-24 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable

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over Bharatia in view of Kay et al. (U.S. Patent No. 5,475,689; "Kay"). Claims 28, 30, and 32 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Bharatia in view of Pepe et al. (U.S. Patent No. 5,742,905; "Pepe"). These rejections are respectfully, but most strenuously, traversed.

It is well-settled that there is no anticipation unless (1) all the same elements are (2) found in exactly the same situation and (3) are united in the same way to (4) perform the identical function. Since the Office Action's citations to each of the applied references is missing at least one element of each of applicants' independent claims, applicants respectfully submit that the claimed invention is not anticipated by the Office Action's citations to the applied references, as further discussed below.

Applicants respectfully submit that the Office Action's citations to the applied references, with or without modification or combination, assuming, *arguendo*, that the modification or combination of the Office Action's citations to the applied references is proper, do not teach or suggest one or more elements of the claimed invention, as further discussed below.

For explanatory purposes, applicants discuss herein one or more differences between the Office Action's citations to the applied references and the claimed invention with reference to one or more parts of the applied references. This discussion, however, is in no way meant to acquiesce in any characterization that one or more parts of the Office Action's citations to the applied references correspond to the claimed invention.

Applicants respectfully submit that the Office Action's citations to the applied references do not teach or suggest one or more elements of the claimed invention. A careful reading of the Office Action's citations to the applied references fails to teach or suggest, for example, generating the command based on the interpretation of the first message, wherein the command

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is one of the set of commands utilized by the database manager, the first protocol gateway, and the second protocol gateway, as recited in applicants' independent claim 8.

Bharatia (column 4, lines 59-64) discloses converting a message:

The IWU 14 receives the message from the ANSI-41 network 12 and, using the ANSI-41 IWU VLR functionality 210 and the GSM MAP IWU HLR functionality 220, converts the message into a GSM format. Thereafter, GSM messaging may be performed with GSM VLR to determine appropriate routing information to the roaming MS 34.

Bharatia discloses converting the message from the ANSI-41 format to the GSM format. The Office Action's citation to Bharatia fails to disclose generating a command, wherein the command is one of a set of commands utilized by the ANSI-41 network, the GSM network, and the database. Simply missing from the Office Action's citation to Bharatia is any mention of generating the command based on the interpretation of the first message, wherein the command is one of the set of commands utilized by the database manager, the first protocol gateway, and the second protocol gateway, as recited in applicants' independent claim 8.

So, the Office Action's citation to Bharatia fails to satisfy at least one of the limitations recited in applicants' independent claim 8.

The shortcomings of the Office Action's citation to Bharatia relative to certain elements of the claimed invention have been discussed above. The Office Action proposes a combination of the citation to Bharatia with a citation to Kay. However, the Office Action's citation to Kay does not overcome the deficiency of the Office Action's citation to Bharatia. Applicants respectfully submit that the proposed combination of the Office Action's citation to Bharatia with the Office Action's citation to Kay fails to provide the required approach, assuming, *arguendo*, that the combination of the Office Action's citation to Bharatia with the Office Action's citation to Kay is proper.

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Kay (column 5, lines 34-45) discloses multiple gateways:

The Traffic Interconnect Local area network (TIL) may be a conventional local area network wherein each of the stations 10-30 is a node thereof. In addition, the gateway 40 is another node of the TIL. As shown in FIG. 1 the gateway 40 has an interface to a Public Switched Data Network (PSDN). While FIG. 1 shows only a single gateway, it should be understood that that showing is only illustrative. Multiple gateways, each perhaps operating on a different data transmission protocol may be nodes of the TIL. Furthermore, if desirable or necessary, the TIL may include more than one LAN.

Kay discloses the multiple gateways that may operate on different data transmission protocols. The Office Action's citation to Kay fails to disclose a command utilized by a database manager, a first protocol gateway, and a second protocol gateway. Simply missing from the Office Action's citation to Kay is any mention of generating the command based on the interpretation of the first message, wherein the command is one of the set of commands utilized by the database manager, the first protocol gateway, and the second protocol gateway, as recited in applicants' independent claim 8.

So, the Office Action's citation to Kay fails to satisfy at least one of the limitations recited in applicants' independent claim 8.

The shortcomings of the Office Action's citations to Bharatia and Kay relative to certain elements of the claimed invention have been discussed above. The Office Action proposes a combination of the citations to Bharatia and Kay with a citation to Pepe. However, the Office Action's citation to Pepe does not overcome the deficiency of the Office Action's citations to Bharatia and Kay. Applicants respectfully submit that the proposed combination of the Office Action's citations to Bharatia and Kay with the Office Action's citation to Pepe fails to provide the required approach, assuming, *arguendo*, that the combination of the Office Action's citations to Bharatia and Kay with the Office Action's citation to Pepe is proper.

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Pepe (column 11, lines 44-54) discloses converting messages:

The PCI server 48 may be based, for example, on either an X.400 MTA or an SMTP router and can convert between both protocols. The PCI server 48 may receive text messages from a variety of different text messaging systems such as Internet mail, third party messaging systems, or proprietary messaging systems. In the example where PCI routes messages using an X.400 MTA, these messages must be converted to conform with X.400 protocol before they can be routed. Thus, an exemplary messaging gateway is an X.400 gateway, which can be designed and built by a person of ordinary skill in the art.

Pepe discloses converting the message between X.400 and SMTP protocols. The Office Action's citation to Pepe fails to disclose generating the command that is one of the set of commands utilized by the database manager, the first protocol gateway, and the second protocol gateway. Simply missing from the Office Action's citation to Pepe is any mention of generating the command based on the interpretation of the first message, wherein the command is one of the set of commands utilized by the database manager, the first protocol gateway, and the second protocol gateway, as recited in applicants' independent claim 8.

So, the Office Action's citation to Pepe fails to satisfy at least one of the limitations recited in applicants' independent claim 8.

The Office Action's citations to Bharatia, Kay, and Pepe all fail to meet at least one of applicants' claimed features. For example, there is no teaching or suggestion in the Office Action's citations to Bharatia, Kay, or Pepe of generating the command based on the interpretation of the first message, wherein the command is one of the set of commands utilized by the database manager, the first protocol gateway, and the second protocol gateway, as recited in applicants' independent claim 8.

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Furthermore, the Office Action does not allege that the art of record provides any teaching, suggestion, or incentive for modifying the citations to Bharatia, Kay, and/or Pepe to provide the claimed approach.

For all the reasons presented above with reference to claim 8, claims 1, 4, 8, 20, and 34 are believed neither anticipated nor obvious over the art of record. The corresponding dependent claims are believed allowable for the same reasons as independent claim 8, as well as for their own additional characterizations.

Withdrawal of the §§ 102 and 103 rejections is therefore respectfully requested.

In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicants' attorney.

Respectfully submitted,



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Dated: June 30, 2005

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